

presentation to include Medin's means of adjusting flicker filter." Office Action, p. 3.

Applicant respectfully disagrees. With respect to Medin, there is no teaching or suggestion for "adjusting a flicker filter based upon the alpha value" as recited by claim 1. Instead, Medin discloses adjusting flicker filter coefficients by determination of perceived flicker energy for a given feature (i.e., image feature width and average brightness). Medin, col. 6, lns. 18-24; 32-34. Such adjusting does not teach or suggest adjusting the flicker filter "based upon the alpha value" as recited by claim 1. In fact, Medin never even mentions an alpha value, and thus there can be no teaching or suggestion for the use thereof for adjusting a flicker filter.

Thus claim 1 and dependent claims 2-9 patentably distinguish over the proposed combination. Further, independent claims 10 and 17 and the claims depending therefrom are also patentable for the same reasons.

As to dependent claims 2 and 18, nowhere does Gloudemans teach or suggest "comparing the alpha value to a predetermined value to arrive at a result." Instead, the "threshold determination step (484)" of Gloudemans referred to by the Office Action relates to an image matching step and not comparison of an alpha value to a threshold. Gloudemans, col. 16, lines 31-40; FIG. 12. Further, the "threshold comparison (506)" referred to by the Office Action relates to a delay threshold, not comparison of an alpha value to a threshold. Gloudemans, col. 20, lines 10 to 40; FIG. 15. Thus claims 2 and 18 patentably distinguish for this further reason.

Regarding claims 3-4 and 19-20, nowhere does Gloudemans teach or suggest subtracting an alpha value from a threshold value to arrive at a second result as recited by claims 3 and 19. The determination of alphas for each of the edge points

referred to by the Office Action does not render obvious these claims. Nor does the "sequence of operations for determining an alpha for an edge point" referred to by the Office Action teach or suggest "dividing the second result by an alpha step value to arrive at a third result; and adjusting the filter level based on the third result" as recited by claims 4 and 20. For these further reasons, claims 3-4 and 19-20 patentably distinguish.


Claims 5, 7, 8, 15, and 21 further patentably distinguish because nowhere does Gloudemans teach or suggest turning off a flicker filter when a predetermined threshold value exceeds the alpha value, or otherwise. Nor does Gloudemans teach or suggest adjusting a filter level, either when an alpha value exceeds a threshold or in response to a result. Thus claims 6, 9, and 22 patentably distinguish for this further reason.

Regarding claims 12 and 16, Gloudemans does not teach or suggest adjusting a level of a flicker filter based on a result of a comparison of an alpha value to a threshold value. Thus for this further reason, claims 12 and 16 are patentable.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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Mark J. Rozman  
Registration No. 42,117  
TROP, PRUNER & HU, P.C.  
8554 Katy Freeway, Suite 100  
Houston, Texas 77024-1805  
(512) 418-9944 [Phone]  
(512) 418-0544 [Fax]

